

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

)	Chapter 11
In re)	
)	Case No. 01-01139 (JKF)
W.R. GRACE & CO., <i>et al.</i> ,)	Jointly Administered
)	
Debtors.)	Hearing Date: June 29, 2009 at 10:30 am
)	Objection Deadline: June 12, 2009

**MOTION BY FIREMAN'S FUND INSURANCE COMPANY
PURSUANT TO BANKRUPTCY RULE 3018 FOR
TEMPORARY ALLOWANCE OF PROOF OF CLAIM NO. 15175**

Fireman's Fund Insurance Company ("Fireman's Fund") hereby moves, pursuant to Fed. R. Bankr. P. 3018, for the entry of an order temporarily allowing its Proof of Claim No. 15175 for the purpose of voting on the First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code of W.R. Grace & Co. (the "Plan," Dkt. No. 20872), in the amount of \$3.86 million, which is an amount other than the \$1.00 valuation proposed by Debtors in the Voting Procedures approved in ¶ 17 of the Court's Order Approving Disclosure Statement, Solicitation And Confirmation Procedures, Confirmation Schedule And Related Relief (Dkt. No. 20944).

The grounds supporting this motion are set forth in the accompanying brief, which is incorporated here in full by this reference.

WHEREFORE, Fireman's Fund respectfully requests that the Court enter an order temporarily allowing Fireman's Fund's claim in the amount of \$3.86 million, for voting purposes only.

A proposed form of order is submitted herewith.

Dated: May 20, 2009

Respectfully submitted,

/s/ John D. Demmy

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